BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA

DOCKET NO. 2021-243-E

IN THE MATTER OF:)	
)	
Application of Duke Energy Progress, LLC)	PETITION TO INTERVENE
for Approval of Rider DSM/EE-13, Increasing)	BY NUCOR STEEL -
Residential and Non-Residential Rates)	SOUTH CAROLINA
)	

Nucor Steel-South Carolina ("Nucor"), a Division of Nucor Corporation, pursuant to Rule 103-825 of the rules and regulations of the South Carolina Public Service Commission ("Commission"), hereby respectfully petitions to intervene in the above-captioned docket. Nucor states the following in support of this petition:

- 1. Nucor owns and operates a steel production facility near Darlington, South Carolina. As a retail customer of Duke Energy Progress, LLC ("DEP"), Nucor purchases hundreds of millions of kWh of electricity annually at a cost of millions of dollars per year. Since the cost of electricity comprises one of the major costs of Nucor's manufacturing process, electric costs directly affect Nucor's ability to continue to produce steel at a competitive price.
- 2. This docket will consider DEP's application for approval of Rider DSM/EE-13, which will recover certain costs and revenue associated with DEP's demand side management and energy efficiency programs. As a large industrial customer of DEP, Nucor has a stake in, and may be directly and substantially affected by, the outcome of this proceeding. Due to the magnitude of its load and its unique service characteristics, Nucor cannot be adequately represented by any other party to this proceeding. At this early stage in the proceeding, Nucor has not fully determined what position it may take and how long it will take to complete its presentation and any cross-examination during the public hearing established for this proceeding. Since 1987, Nucor has actively participated in many previous before this Commission.
- 3. Nucor's mailing address is:

Nucor Steel – South Carolina P.O. Box 525 Darlington, SC 29532 4. Nucor will be represented in this proceeding by the firm of Moore & Van Allen, PLLC. Service and correspondence regarding this proceeding should be sent to the undersigned.

WHEREFORE, for the reasons set forth above, Nucor respectfully requests permission to intervene in this proceeding.

Respectfully submitted,

MOORE & VAN ALLEN, PLLC

Robert R. Smith, II

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Counsel for Nucor Steel – South Carolina

Dated: September 1, 2021

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This is to certify that the foregoing document was served upon the following parties at the addresses set forth by first-class mail or electronic mail on this the <u>1st</u> day of September, 2021:

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